

**BEACH LAW GROUP, LLP**

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Attorneys for Defendant,  
MAXIM HEALTHCARE SERVICES, INC. dba MAXIM  
STAFFING SOLUTIONS; MAXIM HEALTHCARE  
STAFFING SERVICES, INC.; and ERICA WOODS

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

ANTHONY GALLEY, Deceased, by  
and through his Co-Successors in  
Interest, P.P. and B.P., minors, through  
their mother and Next Friend, Christina  
O'Neil, Individually and as Co-  
Successors in Interest for ANTHONY  
GALLEY, Deceased,

Plaintiffs,

v.

COUNTY OF SACRAMENTO, a  
public entity; FORMER  
SACRAMENTO COUNTY SHERIFF  
SCOTT R. JONES, in his individual  
capacity; Jail Commander ANTHONY  
PAONESSA, Jail Medical Director  
VEER BABU, M.D., MAXIM  
HEALTHCARE SERVICES, INC. dba  
MAXIM STAFFING SOLUTIONS, a  
Maryland Corporation; MAXIM  
HEALTHCARE STAFFING  
SERVICES, INC., a Maryland  
Corporation; ERICA WOODS, R.N.,  
and DOES 1-20; individually, jointly,  
and severally,

Defendants.

Case No. 2:23-cv-00325-WBS-AC

**STIPULATION PURSUANT TO  
LOCAL RULE 143 RE:  
EXCLUSION OF ATTORNEY-  
CLIENT PRIVILEGE AND  
ATTORNEY WORK-PRODUCT  
DOCUMENTS FROM PRIVILEGE  
LOG REQUIREMENT**



1 The parties, by and through their respective attorneys of record, hereby  
2 stipulate to the following:

3 **1. PURPOSE**

4 To avoid unnecessary consumption of time, expense, and attorney resources,  
5 the parties agree that responsive documents and tangible things which are protected  
6 by the attorney-client privilege with litigation counsel Beach Law Group, LLP  
7 and/or litigation counsel Porter Scott APC, and/or documents or tangible things  
8 created by litigation counsel Beach Law Group, LLP and/or litigation counsel Porter  
9 Scott APC, or at the direction of Beach Law Group, LLP or litigation counsel Porter  
10 Scott APC, after the initiation of this litigation shall be exempted from the  
11 identification and description required by Federal Rule of Procedure 26, subsection  
12 (b)(5) (FRCP 26(b)(5)).

13 The parties agree that this exemption is limited as described, and each party is  
14 required to comply with FRCP 26(b)(5) for all documents withheld on the basis of  
15 privilege and not subject to the privileges or protections described in this stipulation.

16 **2. DEFINITIONS**

17 2.1 At the direction of Beach Law Group, LLP and litigation counsel Porter  
18 Scott APC – Documents and other tangible things will be considered created at the  
19 direction of Beach Law Group, LLP or litigation counsel Porter Scott APC, if they  
20 were prepared by any member of Beach Law Group, LLP's or any member of Porter  
21 Scott APC staff or experts retained by Beach Law Group, LLP and/or Porter Scott  
22 APC, to assist with this matter (except as disclosure is required by other rules), or  
23 prepared by any party or party's employee or agent at the express request of Beach  
24 Law Group, LLP or Porter Scott APC.

25 2.2 Attorney-client privilege - The attorney-client privilege shall be defined  
26 consistent with the Federal Rules of Evidence.  
27  
28



1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 Dated: January 12, 2024

HADDAD & SHERWIN LLP

3  
4 /s/

5 MICHAEL J. HADDAD

6 JULIA SHERWIN

7 TERESA ALLEN

Attorneys for PLAINTIFF

8 Dated: January 12, 2024

BEACH LAW GROUP, LLP

11 THOMAS E. BEACH

12 RACHEL K. MANDELBERG

Attorneys for Defendants

13 MAXIM HEALTHCARE SERVICES, INC.,

14 MAXIM HEALTHCARE STAFFING

15 SERVICES, INC., and ERICA WOODS,

16 R.N.

17 Dated: January 12, 2024

PORTER SCOTT, APC

19 /s/

20 CARL FESSENDEN

21 JOHN R. WHITEFLEET

MATTHEW W. GROSS

Attorneys for Defendants

22 COUNTY OF SACRAMENTO, Sheriff

23 SCOTT R. JONES, Jail Commander

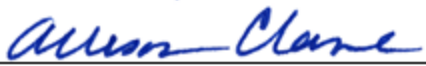
24 ANTHONY PAONESSA, and VEER BABU,  
25 M.D.



**PROPOSED ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 17, 2024

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

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